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December 8, 2015

SENT VIA EMAIL TO: Brian.McDonough@usdoj.gov

Brian M. McDonough, Esq.
Assistant U.S. Attorney
801 W. Superior Ave., Ste. 400
Cleveland, OH 44113

**Re: *United States of America v. John Clements*
Case No. 1:15-cr-00275-DAP**

Mr. McDonough:

Pursuant to Fed. R. Crim. P. 16, as well as *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972), Defendant, John Clements, respectfully requests that the United States produce the following information:

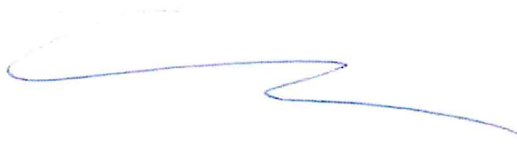
- An installable, working copy of the software known as "Child Protection System," including the Shareaza LE software program used by Detective Don Seamon of the Lake County Sheriff's Office, FBI Child Exploitation Task Force and/or ICAC Department/Division, during the investigation of this case. If different versions of this software(s) exist, please provide copies of the versions used by Seamon during his investigation of Mr. Clements.
- All documents and records in the Government's possession, custody and control – including any documents and records in the possession, custody and control of other law enforcement agencies involved with the investigation of this case, including, but not limited to, the Lake County Sheriff's Department, Federal Bureau of Investigation, and/or ICAC Department/Division – regarding the Child Protection System, including the Shareaza LE software program utilized in this case. This request includes documents concerning the software's technical specifications.



- All documents and records in the Government's possession, custody and control – including any documents and records in the possession, custody and control of other law enforcement agencies involved with the investigation of this case, including, but not limited to, the Lake County Sheriff's Department, Federal Bureau of Investigation and/or ICAC Department/Division – regarding any other software, computer programs, or the like, used by Detective Seamon throughout the course of his investigation of Mr. Clements.

Thank you in advance for your prompt attention to these matters. Please contact me directly with any questions that you might have and/or to make arrangements for the production of the foregoing items. I look forward to speaking with you soon.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Eric C. Nemecek", with a long, sweeping horizontal stroke extending to the right.

Eric C. Nemecek, Esq.

cc: file